

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

|  |                           |
|--|---------------------------|
| In re:   | ) Chapter 11              |
|  | )                         |
| FTX TRADING LTD., <i>et al.</i> , <sup>1</sup> | ) Case No. 22-11068 (JTD) |
|  | )                         |
| Debtors.                                       | ) (Lead Case)             |
|  | )                         |
|  | ) (Jointly Administered)  |
|  | )                         |

**AMENDED NOTICE OF HEARING ON EMERGENT DEBTOR'S DIP FINANCING  
MOTION AND NOTICE OF REVISED FORM OF PROPOSED ORDER**

**PLEASE TAKE NOTICE** that on October 6, 2023, Emergent Fidelity Technologies Ltd (the “Emergent Debtor”), as debtor and debtor-in-possession in Case No. 23-10149 (JTD) (the “Emergent Chapter 11 Case”), filed the *Emergent Debtor’s Motion for Entry of an Order Approving Postpetition Financing and Granting Related Relief* (the “DIP Motion”) [D.I. 3024], and the motion to expedite a hearing and shortening the notice period with respect to the DIP Motion (the “Motion to Shorten”) [D.I. 3025], in the United States Bankruptcy Court for the District of Delaware (the “Court”).<sup>2</sup>

**PLEASE TAKE FURTHER NOTICE** that on October 10, 2023, the Court entered an order granting the Motion to Shorten, which scheduled a hearing on the DIP Motion for October 19, 2023 (the “Hearing”), and provided that any responses to the relief requested in the DIP Motion could be made orally at the Hearing. The Hearing was then rescheduled for October 24, 2023. *See* D.I. 2397.

<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the DIP Motion.

**PLEASE TAKE FURTHER NOTICE** that the Hearing has been rescheduled for **December 12, 2023 at 10:00 a.m., prevailing Eastern Time**, before the Honorable John T. Dorsey, United States Bankruptcy Judge for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE** that the Emergent Debtor hereby submits a revised form of order granting the DIP Motion (the “Revised Proposed Order”), attached hereto as **Exhibit A**, reflecting changes and clarifications to the original form of order annexed to the DIP Motion from various parties in interest, including the U.S. Trustee, FTX, BlockFi, and the unsecured creditors’ committees of FTX and BlockFi. A redline demonstrating same is attached hereto as **Exhibit B**. The Revised Proposed Order does not resolve the U.S. Trustee’s objection to the DIP Motion docketed at 3334.

**PLEASE TAKE FURTHER NOTICE** that any further responses to the relief requested in the DIP Motion and the Revised Proposed Order shall: (a) be in writing; (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Rules for the United States Bankruptcy Court for the District of Delaware, and all General Orders applicable to the above-referenced chapter 11 case; (c) be filed electronically with the Court on the docket of *In re FTX Trading Ltd.*, Case No. 22-11068 (JTD), by registered users of the Court’s electronic filing system and in accordance with the applicable General Orders (available on the Court’s website at <http://www.deb.uscourts.gov>) **by December 1, 2023 at 4:00 p.m., prevailing Eastern Time** (the “Objection Deadline”); and (d) be promptly served on the following parties: (i) counsel to the Emergent Debtor, Morgan, Lewis & Bockius LLP, 2222 Market Street, Philadelphia, PA 19103, Attn: Matthew C. Ziegler ([matthew.ziegler@morganlewis.com](mailto:matthew.ziegler@morganlewis.com)) and David K. Shim ([david.shim@morganlewis.com](mailto:david.shim@morganlewis.com)), (ii) counsel to Fulcrum Distressed Partners Limited, Blank Rome LLP, 1271 6th Avenue, New York,

NY 10020, Attn: Rick Antonoff (rick.antonoff@blankrome.com) and Josef Mintz (josef.mintz@blankrome.com), (iii) the Office of the United States Trustee for Region 3, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: Jon Lipshie (Jon.Lipshie@usdoj.gov), and (iv) all entities that requested notice in the Emergent Chapter 11 Case under Fed. R. Bankr. P. 2002.

Dated: November 17, 2023  
Wilmington, DE

**MORGAN, LEWIS & BOCKIUS LLP**

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